

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

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UNITED STATES OF AMERICA,

*Plaintiff,*

Case No. 16-cr-21-PP

*vs.*

SAMY M. HAMZEH,

*Defendant.*

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**UNOPPOSED MOTION TO AMEND THE SCHEDULING ORDER**

Samy Hamzeh, by counsel, moves to modify the Court's scheduling order regarding submissions in response to the Seventh Circuit's ruling. I have spoken to AUSA Kevin Knight and he has no objection to this request.

The Court previously set a scheduling order that aligned with what the parties had proposed. While enough time was built in and the defense has a significant amount of the work done, undersigned counsel contracted COVID last month and had a rough go of it. Only in the last week, has my energy fully returned. As such, I have not been able to complete the work on the transcripts and meet the previously agreed upon deadlines. Thus, I would respectfully request two additional weeks be added to each sides' deadlines. Again, I have spoken to AUSA Kevin Knight and he does not oppose this request. The new briefing schedule would be as follows:

- By September 17, the defense will submit to the government a draft brief about the statements and evidence that the defense still intends to object to.
- By October 8, the government will respond, identifying the points of agreement and disagreement.
- By October 22, the defense will file an omnibus brief identifying all the points of agreement and disagreement and the briefing in support of *why* certain statements remain inadmissible.
- By November 5, the government will file its response brief.
- By November 12, the defense will file its reply brief.

Dated at Milwaukee, Wisconsin this 31st day of August, 2021.

Respectfully submitted,

/s/ Joseph A. Bugni  
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